

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Majestic Hills, LLC,

Debtor

Bankruptcy Case No. 20-21595-GLT

Chapter 11

Adv. Case No. 20-02091-GLT

NVR, INC. and NORTH STRABANE
TOWNSHIP,

Movants,

v.

MAJESTIC HILLS, LLC and
MUTUAL BENEFIT INSURANCE
COMPANY,

Respondents.

Related Doc. No. 431

Hearings: April 29, 2021 @ 10:30 AM

Responses Due: April 9, 2021

**RESPONSE OF JEANNE E. HECHT TO AMENDED MOTION OF NVR, INC. AND
NORTH STRABANE TOWNSHIP FOR ENTRY OF AN ORDER (A) SCHEDULING A
HEARING ON DEBTOR'S MOTION FOR AN ORDER (I) APPROVING THE
ASSUMPTION OF THE SETTLEMENT AGREEMENT AND RELEASE BETWEEN
THE DEBTOR AND MUTUAL BENEFIT INSURANCE COMPANY, (II) APPROVING
THE SALE OF CERTAIN INSURANCE POLICIES, AND (III) ISSUING AN
INJUNCTION PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES; (B)
DECLARING THAT NON-DEBTORS ARE NOT ENTITLED TO RELEASES; AND (C)
REQUIRING THE SETTLEMENT AMOUNT BE PAID DIRECTLY TO
HOMEOWNERS**

AND NOW, comes Creditor Jeanne E. Hecht by and through her counsel, Peacock
Keller, LLP and Douglas R. Nolin, Esquire, and files the following response to the Amended
Motion of NVR, Inc. and North Strabane Township (Doc. 431) and avers as follows:

1. Creditor Jeanne E. Hecht, a homeowner in the Majestic Hills Homeowners
Association, lost her home in 2018 following condemnation and razing.

2. Since June of 2018, Jeanne E. Hecht has been without her home and without compensation for its loss through no fault of her own.

3. Jeanne E. Hecht hereby advises the Court that she takes no position on the majority of the NVR/North Strabane Township Motion. However, to the extent that the NVR/North Strabane Township Motion promotes a more expeditious payment of funds to the homeowners from the Mutual Benefit settlement, that position is supported by Ms. Hecht.

4. The Court is reminded that all of the homeowners have suffered significant financial losses, with no indication of recouping those losses for the last three (3) years, and anything that can be done to expedite the recovery for the homeowners is supported by Jeanne E. Hecht.

5. Jeanne E. Hecht reserves her right to review and respond to the anticipated amended plan to be filed on behalf of Debtor, Majestic Hills, LLC as well as the pending settlement motions of the Debtor, Majestic Hills, LLC. (Docs. 10 & 12)

WHEREFORE, Jeanne E. Hecht respectfully advises this Honorable Court that she takes no position on the NVR/North Strabane Township Motion, except to the extent that it accelerates payment to the homeowners, in which case she supports it, and respectfully requests this Honorable Court to take such action as is necessary to direct payment to the homeowners.

Respectfully Submitted,

Peacock Keller, LLP

Date: April 9, 2021

By: /s/ Douglas R. Nolin
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CERTIFICATE OF SERVICE

I, Douglas R. Nolin, Esquire, hereby certify that on April 9, 2021, I have electronically filed the foregoing ***RESPONSE OF JEANNE E. HECHT TO AMENDED MOTION OF NVR, INC. AND NORTH STRABANE TOWNSHIP FOR ENTRY OF AN ORDER (A) SCHEDULING A HEARING ON DEBTOR'S MOTION FOR AN ORDER (I) APPROVING THE ASSUMPTION OF THE SETTLEMENT AGREEMENT AND RELEASE BETWEEN THE DEBTOR AND MUTUAL BENEFIT INSURANCE COMPANY, (II) APPROVING THE SALE OF CERTAIN INSURANCE POLICIES, AND (III) ISSUING AN INJUNCTION PURSUANT TO THE SALE OF CERTAIN INSURANCE POLICIES; (B) DECLARING THAT NON-DEBTORS ARE NOT***

ENTITLED TO RELEASES; AND (C) REQUIRING THE SETTLEMENT AMOUNT BE PAID DIRECTLY TO HOMEOWNERS using the electronic filing system which will send notification of such filing to those attorneys registered to receive notice via the CM/ECF system for this matter.

Peacock Keller, LLP

Date: April 9, 2021

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